

MAY 15 1998

**CALIFORNIA FLY FISHERS UNLIMITED**

May 14, 1998

Mr. Rick Breitenbach  
Calfed Bay-Delta Program  
1416 Ninth Street  
Sacramento, Ca. 95814

**Re: Comments on Draft Programmatic EIS/EIR**

Dear Sir,

CFFU, founded in 1962. is the oldest fly fishing club in the capital region. We have approximately 200 active members. Over the years we have actively supported environmental, regulatory and water management policies that were designed to protect and enhance the fishery resources of the Delta and of the State. We are taking this opportunity to offer our comments for the record on the Draft Programmatic EIS/EIR.

**1. OVER EMPHASIS ON ENGINEERED SOLUTIONS:** The EIS/EIR does not explore non capital intensive alternatives to meet the state's future water needs. Water demand and consumption like every commodity is price sensitive. Cheap water encourages misuse and waste. Higher cost water stimulates conservation. All urban and industrial users should be metered with rates structured to penalize excess use. Water subsidies to agriculture should be eliminated. No economic activity should get a free ride at taxpayer expense. Price stimulated conservation reductions in water demand will postpone the need for over designed gigantic public capital expenditures - new dams and canals.

Southern California agriculture uses 4.75 million acre feet of water each year from the Colorado River. The farmers pay \$13.50 an acre foot. The urban consumers of L.A. and San Diego use less than 1.0 mil.A.F. from the River. However, municipal water is priced at \$413.00 an A.F. Price generated modest reductions in the flow of water to agriculture would enable S. Ca. to meet its future urban water needs.

These water price anomalies pose the following policy questions. Is it equitable to require N. Ca. to ship additional water south drawn from the already damaged delicate environment of the Delta for urban use when a comprehensive water pricing strategy could solve the problem? Should expensive engineering solutions be undertaken as a first step without first implementing appropriate pricing conservation policies? Clearly the answer to these questions is NO!

**2. DELTA LEVEE PROBLEMS:** A contributing factor to the present weakness of the delta levees is soil subsidence caused by the oxidation of the peat soils exposed by farming over many decades. Subsidence will therefore continue in the future as a natural inevitable consequence of farming with the problem only getting worse. Is there a cost effective solution? Who should pay for levee repairs - the taxpayers or the farmers that benefit directly? How can levee repairs be made without further environmental damage? These questions demand answers.

**3. EQUITABLE SOLUTION PRINCIPALS:** We support the programs effort to devise equitable solutions to the complex problems described. Should not those parties that contributed directly to the current problems under a doctrine of equity be required to bear a disproportionate share of the burden in solving the impacts they created? Who placed the salmon, steelhead, striped bass and water fowl in such serious jeopardy? Certainly not the sportsmen nor the wildlife resources themselves. Environmental and habitat restoration must not have as its goal the maintenance of the status quo via mitigation but the much higher goal of the fullest possible restoration of currently heavily damaged and in some cases endangered species. The recognition of full restoration of wildlife public trust assets should be the primary stated goal of the program. The state, federal government as well as downstream users must agree to redress the errors of the past and recognize their primary responsibility to the achieve this goal.

In closing, we would urge a broader and more fundamental economic analysis of the state's water problems and management policies that would take into account the inequities of the present price policies and mechanisms that determine how water is used and allocated within the state. Clearly in the future our water resources will need to be conserved and used more prudently. The unspoken victims of poor policy decisions of the past - the public trust assets of the state - deserve priority to redress the damage as new directions are charted. If the state is willing to accept this view, I am confident that supports of the environment and the citizens at large will be supportive.

Very Truly Yours,



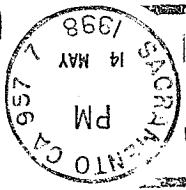
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